

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

---

UNITED STATES OF AMERICA,	)	
	)	
v.	)	
	)	Case No. 15-mj-07218-JCB
RAZA ALI, et al.	)	
	)	
	)	

---

**DEFENDANT RAZA ALI'S  
STATUS REPORT FOR HEARING**

Defendant Raza Ali, through his undersigned counsel, respectfully submits this brief status report in advance of the hearing set for January 28, 2016. This status report is intended to update the Court on the principal issues the parties hope to address at the hearing on January 28.

1. The parties intend to report to the Court on the status of their discussions on the need for Mr. Ali to post security as a condition of his pretrial release. The government has informed Mr. Ali's counsel that it does not intend to press for Mr. Ali to post security as a condition of his release.

2. Mr. Ali expects to raise with the Court the question of whether, and under what circumstances, the defendants can communicate with one another while on pretrial release with regard to ongoing business matters, including the sale of general merchandise and products other than those that are the subject of the complaint in this matter. Mr. Ali proposes the following language as a modification to the conditions of pretrial release:

The defendants may speak to one another solely in connection with selling general merchandise and other products, other than those that are the subject of this complaint. The defendants are otherwise not to discuss this matter in any respect.

Mr. Ali has conferred with counsel for the government and he has stated that he does not oppose such a modification of the conditions of release.

Dated: January 27, 2016

Respectfully submitted,

/s/ Jack W. Pirozzolo

Jack W. Pirozzolo (BBO #564879)  
SIDLEY AUSTIN LLP  
60 State Street, 36th Floor  
Boston, Massachusetts 02109  
Ph: (617) 223-0330  
[jpirozzolo@sidley.com](mailto:jpirozzolo@sidley.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on this day, January 27, 2016, I electronically filed the above Assented-To Motion of Defendant Raza Ali to Extend Time to Post Bond using the CM/ECF system, which will automatically send email notification of such filing to all attorneys of record.

/s/ Jack W. Pirozzolo

Jack W. Pirozzolo